



**DEPARTMENT OF THE NAVY**

ENGINEERING FIELD ACTIVITY, NORTHEAST  
NAVAL FACILITIES ENGINEERING COMMAND  
10 INDUSTRIAL HIGHWAY  
MAIL STOP, #82  
LESTER, PA 19113-2090

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NAS BRUNSWICK  
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IN REPLY REFER TO  
5090  
EV21/OJM  
August 31, 2001

Ms. Claudia Sait  
Maine Department of Environmental Protection  
Bureau of Remediation and Waste Management  
17 State House Station  
Augusta, ME 04333

Dear Ms. Sait:

SUBJECT: RESPONSE TO COMMENTS FROM THE STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION ON THE DRAFT  
REVISED LONG-TERM MONITORING PLAN, SITE 9 NAVAL AIR  
STATION BRUNSWICK MAINE

Below please find the Navy's response to MEDEP comments received in your letter dated 10 August 2001 regarding the draft Site 9 Long Term Monitoring Plan dated July 2001.

COMMENTOR: Claudia Sait

DATE RECEIVED: 10 August 2001

The Maine Department of Environmental Protection (MEDEP or Department) has reviewed the report entitled Long-Term Monitoring Plan, Site 9 (Neptune Drive Disposal Site), dated July 2001, prepared by EA Engineering, Science and Technology. Based on that review the Department has the following comments and issues.

Each of our comments is followed with a code that indicates whether a response is required (RR), no response is required (NR), editorial correction needed (ED); or meeting discussion requested (MTG). No response is required for editorial corrections unless the Navy disagrees with the correction.

**GENERAL COMMENTS**

1. In the review of this document the Department was dismayed to see changes in the text (not included on the revision page) back to language that had been strongly rejected in earlier versions by the State. While this may be an error on the part of the Navy, never the less, it erodes the integrity of the process. The Navy is ultimately responsible for the work produced by their contractor and mistakes of this nature are unacceptable and should not be overlooked or condoned by the Navy. See comments 5 & 7 below.  
(RR)

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*Response- References by the MEDEP to a serious violation of trust, or how our changes erode the integrity of the process are too harsh and unwarranted within the context of our working relationship. If there is an underlying reason for these types of comments, please let us know so that we may address them rather than their effects.*

*As for the wording in the Site 9 LTMP: coming to an agreement on the wording is what a comment review period is for. If we unilaterally went back to using words that we had agreed to remove, then be assured that we'll investigate the reason and take steps to prevent it from happening again. However, it appears that we inadvertently selected those words or ones similar to them in an attempt to quantify to all when we have conducted sufficient sampling. We all recognize that none of us will get all that we want, but it's working together to find the middle ground that we can all live with that has made the program at NASB as successful as it's been.*

*Site 9 is in the post-ROD phase, so the majority of the work is behind us. Comments should be limited to the scope of the remaining effort, without looking to expand the effort beyond the scope of the ROD. Although there is additional monitoring needed, the sampling will come to an end at some point. We're trying to define that point by using language that's definitive and objective. As the lead agency for the Installation Restoration Program at Brunswick Naval Air Station, the Navy works diligently to ensure the selected remedies will protect human health and the environment and that they are operating properly and successfully. However, the Navy is not in the sampling business; we should all be working towards the day when the sites can be written off. Definitive language will help us and our successors to know when that day arrives.*

#### **SPECIFIC COMMENTS**

2. *Page 1-7; Section 1.4.5, Analytical Methods, paragraph 2-If a monitoring well is being considered for deletion from the sampling program for volatile organic compounds, ground-water samples from that well will be analyzed using Method 8260B Modified for SIM for two sampling rounds in order to achieve the detection limit of 0.15 µg/L (State MEG for vinyl chloride).*

*The State has repeatedly objected to the reference to two sampling rounds to eliminate a monitoring well for VOC analysis (specifically vinyl chloride) as stated in comment letters dated August 6, 1999 and January 20, 2000. The Navy finalized the Long*

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Term Monitoring Plan (August 1999) without ever resolving this issue with the State. Two rounds do not represent a significant time period and is dependent on other variables. This paragraph should reflect only the use of Method 8260 modified for SIM for lowering the detection limit for vinyl chloride to meet the State MEGs and should not go into the elimination of monitoring wells which is covered in section 3.3.1. Please rewrite this section. (ED)

*Response—In an effort to optimize the monitoring rounds which measure the effectiveness of our remedies, the Navy has proposed deleting those wells which have reached the asymptote of the contamination trend analysis after seeing contaminant levels below the State MEG or Federal MCL for at least two consecutive rounds. If two consecutive rounds are thought to be insufficient to make this determination, then the Navy would like for the MEDEP to provide their reasoning for determining how many rounds are required, or their method for determining what constitutes a significant time period. Perhaps this would be better resolved on a well by well basis. Let's plan to make this an agenda item for our next technical subcommittee meeting.*

3. *Page 1-7, Section 1.5, Reports and Data Presentation, paragraph 2—*  
"An annual report will also provide the response letters to comments received on the previous year's annual report and monitoring event reports contained in the annual report."

Based on the past year's experience waiting for the annual report to receive responses to comments on the monitoring events and the previous annual report is too long. The annual report for 2000 has yet to be sent out in draft. If there are changes that must be made it could be two year before they would be initiated. This is unacceptable therefore response to comments should be within a more reasonable time frame such as 2 months. (MTG)

*Response—The Navy agrees that the response time between the monitoring events and the release of the annual report is too long. As we agreed to in our 23 August 2001 conference call, the Navy will modify the monitoring event reports to be stand-alone documents that will contain a summary of findings of the data collected to that point, as well as conclusions and recommendations. There will no longer be an annual report. We will provide an outline of this procedure for comment by the TSC. The Navy is proposing to begin this format with the April 2002 sampling event as a natural break-point.*

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4. **Table 1-1**—SVOC are analyzed for in three monitoring wells, MW NASB-69, MW NASB-70, and MW NASB-79. This needs to be clearly shown on table 1-1 either as a separate column or as a footnote. Also the nine monitoring wells at the Navy Exchange Service Station being gauged as part of this program should be listed in table 1-1. (ED)

*Response—Table 1-1 will be edited to clearly show that ground-water samples collected from monitoring wells MW-NASB-69, MW-NASB-70 and MW-NASB-79 are submitted for analysis of semi-volatile organic compounds under the Site 9 Long-Term Monitoring program. A footnote will be added to Table 1-1 for the Navy Exchange Service Station wells that states these wells are gauged, but not sampled as part of the Site 9 LTMP.*

5. **Page 3-2, Section 3.1.5, Sampling Frequency**—"As detection levels continue to decrease, the monitoring frequency will decrease or be eliminated."

The detection levels are not universally decreasing and this language has been rejected by the State before. The language needs to be the same as negotiated for the August 1999 LTMP as follows: "Depending on the long-term trends of the compound concentrations, monitoring frequency may be changed with approval by EPA and MEDEP." (ED)

*Response—Previous language notwithstanding, the Navy is searching for the right words to indicate to all when we can decrease or eliminate monitoring. The suggested language change is vague and subjective in that it doesn't specify the length of the long-term trend. See response to Comment 2.*

6. **Page 3-3, Section 3.3, Analytical Parameters and Procedures**—

a.) The EPA method (8270) for Semi Volatile Organics must be added to this section. (ED)

*Response—This method is stated in the 4<sup>th</sup> bullet of Section 3.3. The bullet text is "Target Compound List semi-volatile organic compounds by EPA SW-846 Method 3520A/8270C."*

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b.) Bullet 5. "Optional field parameters, including Eh and dissolved oxygen, will also be recorded."

MEDEP continues to object to considering these parameters as optional. The remedy for this site is natural attenuation with monitoring therefore the Navy must include all the field parameters necessary to evaluate the success of selected remedy or understand the degradation process. (ED)

*Response—These parameters will be added to the Site 9 Long-Term Monitoring Program.*

7. *Page 3-4, Section 3.3.1, Program Modifications—*"A modification or reduction in the number of sample parameters will occur if a parameter is not detected in ground water at monitoring locations for a significant period of time after two successive monitoring events [sic]."

The language should be revised to its original format in the August 1999 LTMP as follows: "A modification or reduction in the number of sample parameters will occur if a parameter is not detected in ground water at monitoring locations for a significant period of time."

*Response—Please see the Navy's response to MEDEP comment number 2.*

*Additionally, the Navy recommends for consideration by the EPA and MEDEP the following draft language for inclusion into the Site 9 Long-Term Monitoring Plan:*

*"A modification, or reduction, in the number of sample parameters will be proposed if after two consecutive non-detections in ground water at monitoring location(s) and in consideration with the concentration trend for the individual well, it will be considered for modification with the approval of the EPA and MEDEP."*

MEDEP regrets the tone of this letter however it considers the undocumented changes to the LTMP to be a serious violation of trust. If you have any questions or comments please call me at (207) 287-7713.

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*Response—The Navy has worked hard to foster a partnering atmosphere and encourage an open, productive team with no hidden agendas that can address the challenges of our environmental program. In conjunction with the response to General Comments, above, the Navy sees an inadvertent change in language resulting in an accusation of a trust violation. It's disheartening to learn that the MEDEP suspects a sinister motive as the cause when we are not aware that we have ever given the MEDEP adequate reason to be suspect. We will continue to make every effort to work together as we strive towards the same goal, but we strongly object to the accusational language and notions of deception.*

*The Navy, too, regrets such a response; however, it considers the tone of this letter to be unwarranted and degrading to the progress and felt compelled to reply. If you have any questions or comments please call me at (610) 595-0567, ext.164.*

Sincerely,



ORLANDO J MONACO

Remedial Project Manager

By direction of the  
Commanding Officer

Copy to:

Michael Barry - EPA

Anthony Williams - BNAS

Carolyn LePage - LePage Environmental

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